

BECKER & POLIAKOFF LLP

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Attorneys for Defendant Carol Nelson

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro. No. 10-04658 (SMB)

NOTICE OF SUBSTITUTION OF COUNSEL AND PROPOSED ORDER

PLEASE TAKE NOTICE that the undersigned hereby consent to the substitution of the
Becker & Poliakoff LLP for Kramer Levin Naftalis & Frankel, LLP as counsel for Carol
Nelson (the “Defendant”). All notices given or required to be given in this adversary
proceeding shall be given to and served upon the following:

BECKER & POLIAKOFF, LLP
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PLEASE TAKE FURTHER NOTICE that the Defendant has knowledge of and
consent to this substitution of counsel.

April 9, 2014

**KRAMER LEVIN NAFTALIS &
FRANKEL, LLP**

*Withdrawing Attorneys for Defendant
Carol Nelson*

April 9, 2014

BECKER & POLIAKOFF LLP

*Superseding Attorneys for Defendant
Carol Nelson*

By: /s/ Philip Bentley

Philip Bentley
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By: /s/ Helen Davis Chaitman

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SO ORDERED:

/s/
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: April __, 2015
New York, New York

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DECLARATION OF HELEN DAVIS CHAITMAN

I, HELEN DAVIS CHAITMAN, declare as follows:

1. I am a member of the firm Becker & Poliakoff, LLP and a member of the Bar of this Court Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. I submit this declaration in support of the accompanying notice and proposed order substituting Becker & Poliakoff, LLP for Kramer Levin Naftalis & Frankel, LLP as counsel for Carol Nelson (the “Defendant”) in the above-captioned adversary proceeding. I also have read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendant has requested and consents to this substitution of counsel.

3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 9, 2014

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman